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**ORIGINAL
FILED**

JUN 13 2007

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

E-filing

MMC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. 1997 LAMBORGHINI DIABLO, VIN
ZA9RU37P6VLA12636,
2. 2006 PORSCHE CAYENNE TURBO,
VIN WP1AC29P96LA91296,
3. \$8,692.42 IN FUNDS SEIZED FROM
COMMERCE BANK ACCOUNT
HELD IN THE NAME OF PSA, LLC.,
4. \$6,314.76 IN FUNDS SEIZED FROM
COMMERCE BANK ACCOUNT
HELD IN THE NAME OF
PHARMACY USA, LLC, AND
5. \$1,076,636.89 IN FUNDS SEIZED
FROM TD AMERITRADE ACCOUNT
HELD IN NAME OF CHRISTOPHER
NAPOLI,

Defendants.

No. 07- 3111

NOTICE OF FORFEITURE ACTION

1 A civil complaint seeking forfeiture pursuant to Title 18, United States Code, Section
2 981(a) and Title 21, United States Code, Section 881(a)(6) was filed on June 13, 2007, in the
3 United States District Court for the Northern District of California by the United States of
4 America, plaintiff, against the *in rem* defendant funds and vehicles.

5 In order to contest forfeiture of the *in rem* defendant funds and vehicles, any person who
6 asserts an interest in or right against the funds must file a verified statement identifying the
7 interest or right within 35 days after the date of service of the complaint in accordance with Rule
8 G(5) of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims or within
9 30 days after the date of final publication of the Notice of Forfeiture Action, whichever is earlier.
10 Additionally, a claimant must serve and file an answer to the complaint or a motion under Rule
11 12 of the Federal Rules of Civil Procedure within 20 days after filing the claim.

12 An agent, bailee or attorney must state the authority to file a statement of interest or right
13 against the property on behalf of another.

14 Statements of interest and answers should be filed with the Office of the Clerk, United
15 States District Court for the Northern District of California, 450 Golden Gate Avenue, 16th Floor,
16 San Francisco, California 94102, and copies should be served on Stephanie M. Hinds, Assistant
17 United States Attorney, 450 Golden Gate Avenue, 9th floor, San Francisco, California 94102.

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19 Respectfully submitted,

20 SCOTT N. SCHOOLS
21 United States Attorney

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23 STEPHANIE M. HINDS
24 Assistant United States Attorney

25 Dated: June 13, 2007